

**GIBBONS**

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March 5, 2014

**VIA ECF**

Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court  
King Fed. Bldg. & United States Courthouse  
50 Walnut St.  
P.O. Box 999  
Newark, New Jersey 07101-0999

**Re: Montvale Surgical Center, LLC v. Connecticut Gen. Life Ins. Co., et al.**  
**Civil Action No. 12-05257 (SRC) (CLW)**

Dear Judge Waldor:

We represent Defendants Connecticut General Life Insurance Company and CIGNA Healthcare of New Jersey, Inc. (collectively, "Defendants") in the above-referenced action. We write as a follow-up to the telephonic status conference held in this matter earlier today.

For the reasons discussed during the status conference, the parties jointly and respectfully request that the upcoming deadlines set forth in the Court's Pretrial Scheduling Order [ECF No. 33] be extended for a period of 30 days and that all other provisions of the Order remain in place. Such request would affect the deadline for (i) motions to add new parties, and (ii) motion to amend pleadings, which are set forth in Paragraphs 2 and 3 of the Order, respectively. The new deadline for each would be April 16, 2014.

If the foregoing meets with Your Honor's approval, we respectfully request that Your Honor grant this request. Thank you for Your Honor's consideration. I would welcome receiving a call if any member of the Court's staff has any questions or if I may be of any service to the Court.

Respectfully submitted,

*Ryan E. Hanlon*

Ryan E. Hanlon

cc: Andrew R. Bronsnick, Esq. (via ECF)  
E. Evans Wohlforth, Jr., Esq. (via ECF)

SO ORDERED

*Cathy L. Waldor*  
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Cathy L. Waldor, U.S.M.J.

Date:

3/17/14